

**FILED**  
Clerk  
District Court

**MAY 14 2008**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF THE NORTHERN MARIANA ISLANDS**  
By For The Northern Mariana Islands  
(Deputy Clerk)

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOMINIC CHPTWELONG,  
MASAIOSHY DAIKICHI SALLEM, and  
JAMES OCHCHA,

Defendants.

Case No.: **CR 08 - 00017**

**INDICTMENT**

Violations of 18 U.S.C. §§ 371, 641, and  
1369

Conspiracy to Sell Government Property  
(Count I)

Theft of Government Property  
(Count II)

Destruction of Veterans' Memorials  
(Count III)

The Grand Jury charges that:

**COUNT I**

(Conspiracy to Sell Government Property)

From on or about November 1, 2007, to on or about November 7, 2007, on Saipan, in the District of the Northern Mariana Islands, defendants Dominic CHPTWELONG, Masaioshy Daikichi SALLEM, and James OCHCHA, and others known and unknown, did unlawfully, willfully and knowingly combine, conspire, confederate and agree with other persons both known and unknown to the Grand Jury, to commit an offense against the United States; that is: to steal, purloin, and without authority sell, convey and dispose of, a thing of value and property of the United States, and to receive, conceal, and retain it with the intent to convert it to his gain,

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2 knowing it to have been stolen, purloined and converted, in violation of Title 18, United States  
3 Code, Section 641; and

4  
5 OVERT ACTS

6 In furtherance of said conspiracy and to effect the objects thereof, defendants Dominic  
7 CHPTLEWONG, Masaiohy Daikichi SALLEM, James OCHCHA, and their co-conspirators,  
8 committed the following overt acts, among others, in the Northern Mariana Islands; that is:

9 1. On or about the morning of November 1, 2007, defendant Dominic  
10 CHPTWELONG sold a portion of the metal lighting units stolen from American Memorial Park  
11 to the employees of Huang Zheng recycling center, and was accompanied by defendant James  
12 OCHCHA;

13 2. On or about the afternoon of November 1, 2007, defendant Dominic  
14 CHPTWELONG sold a portion of the metal lighting units stolen from American Memorial Park  
15 to the employees of Huang Zheng recycling center, and was accompanied by defendant James  
16 OCHCHA;

17 3. On or about November 4, 2007, defendant Masaiohy Daikichi SALLEM sold a  
18 portion of the metal lighting units stolen from American Memorial Park to the employees of  
19 Huang Zheng recycling center;

20 4. On or about November 5, 2007, defendant Dominic CHPTWELONG sold a portion  
21 of the metal lighting units stolen from American Memorial Park to the employees of Huang  
22 Zheng recycling center;

23 5. On or about November 7, 2007, defendants Dominic CHPTWELONG and James  
24 OCHCHA were present at Huang Zheng recycling center and there attempted to sell a portion of  
25 the metal lighting units stolen from American Memorial Park to the employees of Huang Zheng  
recycling center;

all in violation of Title 18, United States Code, Section 371.

**COUNT II**

(Theft of Government Property)

Between on or about November 1, 2007, and on or about November 7, 2007, on Saipan, in the District of the Northern Mariana Islands, defendants Dominic CHPTWELONG, Masaioshy Daikichi SALLEM, and James OCHCHA, unlawfully and knowingly did steal, purloin and without authority sell, convey and dispose of, a thing of value of the United States and of any department and agency thereof, and property made under contract for the United States and any department and agency thereof, and did receive, conceal and retain it; that is: metal lighting units that were the property of the United States Department of the Interior, National Park Service, said metal lighting units having a value of more than one thousand dollars (\$1,000.00), with the intent to convert it to his gain, knowing it to have been stolen, purloined and converted, in violation of Title 18, United States Code, Section 641.

**COUNT III**

(Destruction of Veterans' Memorials)

Between on or about November 1, 2007, and on or November 7, 2007, on Saipan, in the District of the Northern Mariana Islands, defendant James OCHCHA did unlawfully and willfully injure and destroy metal lighting units, structures, and monuments on public property commemorating the service of persons in the armed forces of the United States, said metal lighting units, structures, and monuments being located on property owned by and under the jurisdiction of the Federal Government; that is: in the Court of Honor and on park property near

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1  
2 the Beach Road entrance, all in American Memorial Park, in violation of Title <sup>1842M</sup>~~21~~, United States  
3 Code, Section 1369.

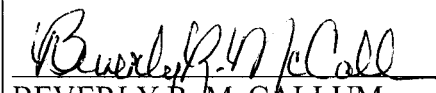
4 DATED this 14th day of May, 2008  
5

6  
7 A TRUE BILL

8 

9 Foreperson

10 LEONARDO M. RAPADAS  
11 United States Attorney  
12 Districts of Guam and CNMI

13   
14 BEVERLY R. McCALLUM  
15 Assistant United States Attorney